



## **PROGRESS REPORT NO. 125**

**TO:** Laura Buelow, U.S. Environmental Protection Agency (EPA) – via Email  
Dustan Bott, EPA – via Email  
Kathryn Cerise, EPA – via Email

**FROM:** Kris McCaig – Teck American Incorporated (TAI)

**DATE:** December 2, 2016

**FILE NO:** 01-773180-000

**RE:** Upper Columbia River (UCR) Remedial Investigation/Feasibility Study  
(RI/FS) - Progress Report No. 125 Month Ending November 2016

---

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Phase 2 Sediment Study - Field sampling activities were completed on October 24, 2013, short-term bioassay tests (i.e., 10-day *Chironomus dilutes* and 28-day *Hyalella azteca*) were completed for all batches on April 24, 2014, long-term bioassay tests (i.e., *Chironomus dilutes* and 42-day *Hyalella azteca*) were completed for all batches on May 4, 2015, and backscatter electron microscopy (BSEM) analysis on selected samples was completed in May 2015. TAI delivered the draft data summary report (DSR) to EPA on December 18, 2015.

Benthic Macroinvertebrate Tissue Study – EPA granted approval of the Final QAPP in a letter to TAI on April 14, 2016. Spring field sampling took place between April 26 and May 19, 2016, and summer/fall field sampling took place between September 6, 2016, and October 5, 2016. TAI revised the sample compositing plan and submitted a draft final version to EPA on October 27, 2016. TAI held a conference call with EPA on November 1, 2016 to give an overview of the revised compositing plan and answer preliminary questions. At EPA's request, TAI followed up with a summary of the process used for revising the compositing plan in an email dated November 3, 2016.

Human Health – TAI received from EPA, the draft data analysis report (DAR) for the Recreational Use Survey on January 17, 2014 and submitted comments to EPA on June 11, 2014. TAI received from EPA, a November 23, 2015 Memorandum written by SRC titled "Recreation Use Survey Fish Ingestion Rate" and is reviewing and evaluating to

provide comments. It is important to note that SRC's memorandum references the following version of the DAR for the recreational use survey: "SRC, Inc. (2014). Data analysis report for the recreational use survey for the Upper Columbia River Site human health risk assessment and remedial investigation/feasibility study. Prepared under contract for the Environmental Protection Agency. January 16." As noted above, TAI submitted comments to EPA on the January 2014 DAR version on June 11, 2014. EPA circulated the Draft Final DAR for review by TAI and the Participating Parties on April 15, 2016 and TAI submitted comments to EPA on June 10, 2016.

On June 27, 2016 EPA submitted the April 30, 2016 report titled "Statistical Review of a Report on Food Consumption and Resource Use among Residents of the Colville Reservation" as prepared by The Mountain-Whisper-Light Statistics for TAI to review and provide comment. TAI provided review comments to EPA on September 26, 2016.

2016 Residential Soil Sampling – Field Reconnaissance Plan took place between April 26, 2016 and May 18, 2016. Field sampling was conducted during the months of August and September and was completed on September 25, 2016. Samples were collected at a total of 144 residences. Sample processing and analysis, and data validation activities continued during the month of November and will continue in December.

White Sturgeon Sediment Toxicity Study – In January 2014 TAI submitted to EPA, the draft final version of the Assessment of Sediment Toxicity to White Sturgeon DSR and response to EPA's comments. On August 10, 2015 TAI met with EPA to discuss the draft final DSR and TAI's response to comments and clarify further changes needed in order to revise the DSR. TAI submitted a revised DSR and revised response to comments to EPA on November 20, 2015.

Soil Amendment Technologies Evaluation Study – TAI is received a letter from EPA on June 21, 2016 regarding approach for conducting the evaluation study and proposed that EPA perform the treatability study with Teck's funding. At the time of writing TAI responded to EPA's letter on July 6, 2016 in agreement that a treatability study should be done, but is disagreeing that EPA needs to be in the lead.

Baseline Ecological Risk Assessment (BERA) – On June 17, 2016 EPA submitted a letter to TAI "Upper Columbia River Baseline Ecological Risk Assessment TRV Development Follow Up." TAI is evaluating the letter and will continue to work with EPA on action items outlined in the letter.

Analytical Support for Sturgeon Sampling Effort – EPA sent a letter to TAI on September 30, 2016 with the final sample compositing approach for the 72 sturgeon fillet samples that were collected by EPA's contractor and shipped to TAI's contract laboratory during the months of August and September 2016. Samples have been processed and analyzed and data will be validated in December and submitted to EPA for review. On November 17, 2016 EPA delivered the draft field summary report for review and requested comments by December 19, 2016.

Assessment and Estimations of Upland Soils on the UCR Site – TAI is in receipt of EPA's letter of July 22, 2016 which provided formal transmittal of an EPA LOE for Assessment and Estimations of Upland Soils on the UCR site and is reviewing and evaluating the LOE. As part of the review and evaluation, TAI requested documents and data cited in the LOE from EPA and EPA has provided all documents and data requested.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.